

**Hallisey and Johnson PC
465 California St, Ste 405
San Francisco, CA 94104
(415) 433-5300**

May 30, 2020

Delivered via ECF and email: Montali_Orders@canb.uscourts.gov

The Honorable Dennis Montali
Judge, United States Bankruptcy Court
Northern District of California
Courtroom 17
450 Golden Gate Ave.
San Francisco, CA 94102

**Re: In re PG&E Corporation, et al. - Plan Confirmation Hearing
Case No. 19-30088
REQUEST TO CROSS-EXAMINE DEBTORS' WITNESS,
KENNETH ZIMAN**

Dear Judge Montali,

Francis O. Scarpulla and myself represent multiple claimants in various wildfire claims that have been filed in this bankruptcy ("Certain Wildfire Claimants/Creditors").

This is to request the opportunity to cross-examine one of the Debtors' witnesses, Kenneth Ziman in the Plan confirmation hearing. It is not my intention to take an undue amount of the Court's time. I estimate it would take about forty-five to fifty minutes.

As you know, my clients filed a Joinder in the Objection of the Official Committee of Tort Claimants ("TCC") to the Plan Confirmation [DKT 7451]. Mr. Scarpulla and myself have refrained from trying to extend the time of these proceedings, but we think it necessary and imperative to examine Mr. Ziman to establish a record.

Thank you for your consideration.

Sincerely,

/s/ Jeremiah F Hallisey
Jeremiah F. Hallisey

cc: All counsel via ECF